

12 May 2015

Electricity Authority
PO Box 10041
Wellington 6143

By email: submissions@ea.govt.nz

Dear Sir or Madam

Access to Consumption Data Formats and Process document

Thank you for the opportunity to submit on the Electricity Authority's Consultation Paper – *Access to Consumption Data Formats and Process document*. We have provided some responses to the specific questions in Appendix 1.

The purposes of EIEP 13A and EIEP 13B

Paragraph 3.3.1 of the consultation document describes EIEP 13A as detailed electricity consumption information and EIEP 13B as summary consumption information. We consider the primary purpose of EIEP 13A is to provide detailed electricity consumption information to agents. The primary purpose of EIEP 13B is to provide summary information to consumers.

No benefit would be gained from an agent receiving both EIEP13A and EIEP13B and therefore requests for EIEP 13B should be limited to consumers. This would support the purpose of the Code Amendment by reducing the need to build unnecessary processes for the two data formats.

We agree with the Authority that consumers may prefer to access the summary information in EIEP 13B electronically, but we see absolutely no benefit in requiring this information to also be sent by post on request. Any such requirement serves to restrict competition and innovation, and the ability of retailers to pick and choose the channels of communication they offer to their customers.

We are concerned with the requirement to provide EIEP13A to agents via email because of the security risks associated with such transfer mechanism. A more workable approach that directly addresses the purpose of the Code Amendment without introducing significant risks to the security of our customers' information and their privacy, is to limit requests for EIEP 13A to agents accessing the information through the registry EIEP transfer hub. In our view, agents with due respect for the security of their clients' private information will wish to access EIEP 13A via the hub. In addition, limiting agents to requesting information via the EIEP hub, ensures the Authority's 'EIEP access approval requirement' cannot be bypassed; an important check and balance we believe is needed to address some of the security concerns raised by the industry.

Finally, we also consider that availability via a Retailer's portal should apply equally to EIEP13A and EIEP13B. Retailers who already provide information equivalent to EIEP13B

may consider it efficient, at their discretion, to also provide information that is similar to EIEP13A directly to customers.

Consumer Authorisation code

We are unsure of the purpose of the Consumer Authorisation code (**code**) which the Authority has introduced in this consultation document. As we read it, the code's purpose is to assist retailers in correctly identifying consumer information in their systems. In our view this is not required, as retailers rather than the Authority should be responsible for ensuring their systems correctly identify and ring-fence consumer information.

We would be extremely concerned if the code was intended to replace the process for authenticating agent authorisations. There would be serious risks for all parties in substituting the code for the authorisation process.

Please contact me on (09) 3088271 or by email monica.choy@mightyriver.co.nz with any queries.

Yours sincerely



Monica Choy

Market Operations Manager

Appendix 1: Table of responses to specific questions

Question No.	Related document	Question	Response
Q1	Procedures	Do you have any comments on the draft procedure document for the exchange of consumer consumption information?	<p><u>EIEP 13A</u></p> <p>Requests for EIEP 13A should be limited to authorised agents accessing via the registry EIEP transfer hub. In our view, the only truly reliable and secure method for transfer of this information to agents is via the hub.</p> <p><u>EIEP 13B</u></p> <p>EIEP 13B is intended to be summary information, in contrast to the detailed information in EIEP 13A. We assume that agents will always prefer and request the detailed EIEP 13A, so building processes to support the delivery of EIEP 13B to agents seems redundant. We suggest that requests for EIEP 13B be limited to consumers only.</p> <p>To avoid confusion, the procedures should also be amended to state unambiguously that EIEP 13B only refers to NHH information. Currently, paragraph 34 (d) of Appendix C states that EIEP 13B only includes NHH consumption information, which is in line with the description of EIEP 13B in paragraph 3.3.1 of the Consultation Paper. However, this conflicts with paragraph 12 of Appendix E and paragraph 3.5.4 of the Consultation Paper which incorrectly state that EIEP 13B “must be the most detailed consumption information that the retailer holds in its systems or the information used to</p>

			<p>generate a customer's invoice." These paragraphs should be amended to provide that EIEP 13B requires NHH information only.</p> <p><u>EIEP 13C</u></p> <p>Consistent with our view on EIEP 13A, only an agent should be the sending party for EIEP 13C.</p>
Q2	EIEP 13A	Do you have any comments on the draft EIEP 13A?	See our response to Question 1.
Q3	EIEP 13A	Do you consider there are any alternatives to an EIEP 13A? Please give reasons for the alternatives.	
Q4	EIEP 13B	Do you have any comments on the proposed EIEP 13B? Please give reasons and discussion where you disagree.	See our response to Question 1.
Q5	EIEP 13B	Do you consider there are any alternatives to an EIEP 13B? Please give reasons for the alternatives.	
Q6	EIEP 13B	Do you currently have a method for providing a consumer consumption information? If yes, what is the method and does it include the information that is in	<p>We provide granular consumption data to our customers through:</p> <ul style="list-style-type: none"> • GEM – Mercury's Good Energy Monitor which allows customers a readily available and free download service of their electricity consumption data

		EIEP 13B?	<ul style="list-style-type: none"> through our Globug and Bosco websites.
Q7	EIEP 13C	Do you agree that an EIEP 13C is required? Please give reasons and discussion where you disagree or consider there are alternatives.	Yes. EIEP 13C should only be utilised via the EIEP hub and Appendix F should be amended accordingly.
Q8	EIEP13C	Do you agree that an electronic request form should be provided to allow machine to machine requests provided that the retailer has verified the consumer's request? Please give reasons where you disagree.	We agree that an electronic request form should be provided to allow machine to machine requests. However, agents rather than retailers ought to verify a consumer's request and then confirm that authorisation to retailers (in the manner required by retailers) when making a request for information.
Q9	EIEP 13C	Do you agree with the use of a Consumer Authorisation code in EIEP 13C? If you disagree please give reasons.	<p>We do not understand the purpose of the Consumer Authorisation code. In our view it is not required to assist retailers in managing their customer information.</p> <p>The Consumer Authorisation code must not be taken to replace the process of authenticating agent authorisations. There would be serious risks for all parties in substituting the code for the authorisation process.</p>
Q10	EIEP 13A & 13C	Do you agree that the registry EIEP transfer hub should be used as one of the transfer mechanisms for EIEP 13A and 13C? Please give reasons where you disagree.	The registry EIEP transfer hub should be the <u>only</u> transfer mechanism for EIEP 13A and 13C for agents for the reasons discussed above For consumers, 13A and 13B should only be accessible via electronic means (including the Retailers portal where possible).

